

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	:	Criminal No. 03-98
v.	:	Date Filed: _____
ANTHONY WILLIAMS,	:	Violations:
 a/k/a “Robert Williams,”	:	18 U.S.C. § 371 (Conspiracy to make
JOAO DIALLO SEBASTIAO,	:	false statements to firearms dealer - 1
 a/k/a/ “Dee,”	:	count)
GERALD BELL	:	18 U.S.C. §§ 924(a)(1)(A) and 2 (Causing
	:	false statements to dealer - 7 counts)
	:	18 U.S.C. § 922(g)(1) (Felon in possession
	:	of firearms - 3 counts)
	:	21 U.S.C. § 841 (Possession with intent to
	:	distribute more than 5 grams of cocaine
	:	base (“crack”) - 1 count)
	:	21 U.S.C. § 841(a)(1) (Possession with
	:	intent to distribute cocaine - 1 count)
	:	21 U.S.C. § 841(a)(1) (Distribution of
	:	cocaine - 1 count)
	:	21 U.S.C. § 841(a)(1) (Distribution of
	:	cocaine base (“crack”) - 2 counts)
	:	18 U.S.C. § 924(c)(1) (possession of a
	:	firearm in furtherance of a drug
	:	trafficking crime - 2 counts)
	:	Notice of Forfeiture

SUPERSEDING INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

AT ALL TIMES MATERIAL TO THIS INDICTMENT:

1. Defendant ANTHONY WILLIAMS was barred from legally purchasing and possessing a firearm because he had previously been convicted of a felony crime for which he could be punished by imprisonment for more than one year.

2. Each of the entities listed below was located in the Eastern District of Pennsylvania, possessed a federal firearms license (“FFL”) and was authorized to deal in firearms under federal law:

- a. Archery and Gun Outfitters, 671 Bethlehem Pike, Montgomeryville, Pennsylvania;
- b. Mike and Kate’s Sport Shoppe, 7245 Oxford Avenue, Philadelphia, Pennsylvania;
- c. The Shooter Shop, 2001 E. Allegheny Ave., Philadelphia, Pennsylvania;
- d. Delia’s Gun Shop, 6104 Torresdale Ave., Philadelphia, Pennsylvania;
- e. U.S. Heritage, 641 Route 309, Montgomeryville, Pennsylvania; and,
- f. Fishtown Lock & Gun, 453 E. Girard Ave., Philadelphia, Pennsylvania.

3. FFL holders were licensed, among other things, to sell firearms and ammunition. Various rules and regulations promulgated under the authority of Title 18, United States Code, Chapter 44 (Sections 921-929) govern the manner in which an FFL holder may sell firearms and ammunition.

4. The rules and regulations governing FFL holders required that a person seeking to purchase a handgun fill out a “Firearms Transaction Record,” ATF Form 4473. Part of the Form 4473 required that the prospective purchaser certify truthfully, subject to penalties of perjury, that he or she was the actual buyer of the firearm. The Form 4473 contained language warning that “[t]he federal firearms laws require that the individual filling out this form must be buying the firearm for himself or as a gift. Any individual who is not buying the firearm for

himself/herself or as a gift, but who completes this form, violates the law.” A person who purchases a firearm for another person and falsely completes the Form 4473 is a “straw purchaser.”

5. FFL holders were required to maintain a record, in the form of a completed Form 4473, of the identity of the actual buyer of firearms sold by the FFL holder.

6. From on or about October 1, 2001 until on or about January 17, 2003, defendants

**ANTHONY WILLIAMS,
a/k/a “Robert Williams,”
JOAO DIALLO SEBASTIAO,
a/k/a “Dee,” and
GERALD BELL**

conspired and agreed with each other and others known and unknown to the grand jury to commit an offense against the United States, that is, to knowingly make false statements with respect to the information required to be kept in the records of a federally licensed firearms dealer, specifically, the identity of the actual buyer of firearms, in violation of Title 18, United States Code, Section 924(a)(1)(A).

MANNER AND MEANS

7. It was part of the conspiracy that defendants ANTHONY WILLIAMS and JOAO DIALLO SEBASTIAO asked defendant GERALD BELL, who was not prohibited from purchasing firearms for himself, to purchase certain firearms for defendants ANTHONY WILLIAMS and JOAO DIALLO SEBASTIAO and others known and unknown to the grand jury, by falsely stating to the firearms dealer that defendant GERALD BELL was the actual buyer of the firearms.

It was further part of the conspiracy that:

8. Defendant JOAO DIALLO SEBASTIAO, defendant ANTHONY WILLIAMS and others known and unknown to the grand jury drove defendant GERALD BELL to the Archery & Gun Outfitters, Mike and Kate's Sport Shoppe and other FFLs so that defendant GERALD BELL could straw purchase firearms.

9. Defendants ANTHONY WILLIAMS and JOAO DIALLO SEBASTIAO told defendant GERALD BELL what firearms to purchase.

10. Defendants ANTHONY WILLIAMS and JOAO DIALLO SEBASTIAO provided defendant GERALD BELL with cash to pay the firearms dealers.

11. At the direction of defendants ANTHONY WILLIAMS and JOAO DIALLO SEBASTIAO, defendant GERALD BELL purchased specified firearms after completing the required ATF Form 4473 (Firearms Transaction Record) and falsely stating that he was the actual buyer of the firearms.

12. At the direction of defendants ANTHONY WILLIAMS and JOAO DIALLO SEBASTIAO, defendant GERALD BELL transferred the straw purchased firearms to defendants ANTHONY WILLIAMS and JOAO DIALLO SEBASTIAO.

13. Defendants ANTHONY WILLIAMS and JOAO DIALLO SEBASTIAO provided defendant GERALD BELL with cocaine base ("crack") as payment for defendant GERALD BELL's straw purchasing firearms.

14. Defendants ANTHONY WILLIAMS and JOAO DIALLO SEBASTIAO transferred many of these firearms to others for profit.

15. Defendants ANTHONY WILLIAMS and JOAO DIALLO SEBASTIAO

made efforts to avoid detection and prosecution, including directing defendant GERALD BELL to report to the police that the straw purchased firearms had been stolen and directing defendant GERALD BELL to lie about the firearms that he had straw purchased.

OVERT ACTS

In furtherance of the conspiracy, defendants ANTHONY WILLIAMS, JOAO DIALLO SEBASTIAO, GERALD BELL and others known and unknown to the grand jury, committed the following overt acts, among others, in the Eastern District of Pennsylvania and elsewhere:

The October 30, 2002 Straw Purchases of Two Firearms

On or about October 30, 2002:

1. Defendant JOAO DIALLO SEBASTIAO drove defendant ANTHONY WILLIAMS and defendant GERALD BELL to Archery and Gun Outfitters.
2. Before defendant GERALD BELL entered Archery and Gun Outfitters, defendants ANTHONY WILLIAMS and JOAO DIALLO SEBASTIAO gave defendant GERALD BELL money to purchase two firearms.
3. Defendants GERALD BELL, ANTHONY WILLIAMS and JOAO DIALLO SEBASTIAO entered Archery and Gun Outfitters.
4. Defendant GERALD BELL, at the direction of defendants ANTHONY WILLIAMS and JOAO DIALLO SEBASTIAO, purchased a Springfield, Model XD, .40 caliber semi-automatic pistol, bearing serial number US442096 and a Smith and Wesson, Model SW30, .380 caliber, semi-automatic pistol, bearing serial number RAJ2526, by falsely stating on the ATF 4473 form that he was the actual buyer of the firearms.

5. At the direction of defendants ANTHONY WILLIAMS and JOAO DIALLO SEBASTIAO, defendant GERALD BELL transferred to defendants ANTHONY WILLIAMS and JOAO DIALLO SEBASTIAO the two firearms that defendant GERALD BELL had just purchased, that is, a Springfield, Model XD, .40 caliber semi-automatic pistol, bearing serial number US442096 and a Smith and Wesson, Model SW30, .380 caliber, semi-automatic pistol, bearing serial number RAJ2526.

6. Defendant JOAO DIALLO SEBASTIAO drove defendant GERALD BELL to his residence.

7. Later that day, defendant ANTHONY WILLIAMS and/or defendant JOAO DIALLO SEBASTIAO provided defendant GERALD BELL with cocaine base (“crack”) as a payment to GERALD BELL for straw purchasing firearms.

The October 31, 2002 Straw Purchases of Three Firearms

On or about October 31, 2002:

8. Defendant JOAO DIALLO SEBASTIAO drove defendant ANTHONY WILLIAMS and defendant GERALD BELL to Archery and Gun Outfitters.

9. Before defendant GERALD BELL entered Archery and Gun Outfitters, defendants ANTHONY WILLIAMS and JOAO DIALLO SEBASTIAO gave defendant GERALD BELL money to purchase three firearms.

10. Defendants GERALD BELL, ANTHONY WILLIAMS and JOAO DIALLO SEBASTIAO entered Archery and Gun Outfitters.

11. Defendant GERALD BELL, at the direction of defendants ANTHONY WILLIAMS and JOAO DIALLO SEBASTIAO, purchased a Ruger, Model P95DC, 9 mm., semi-

automatic pistol, bearing serial number 31463789, a Taurus, Model PT99, 9 mm., semi-automatic pistol, bearing serial number L49873, and an Intratec, Model Tec-9, 9 mm., semi-automatic pistol (a semi-automatic assault weapon), bearing serial number D017120, by falsely stating on the ATF 4473 form that he was the actual buyer of the firearms.

12. At the direction of defendants ANTHONY WILLIAMS and JOAO DIALLO SEBASTIAO, defendant GERALD BELL transferred to defendants ANTHONY WILLIAMS and JOAO DIALLO SEBASTIAO the three firearms that defendant GERALD BELL had just purchased, that is, a Ruger, Model P95DC, 9 mm., semi-automatic pistol, bearing serial number 31463789, a Taurus, Model PT99, 9 mm., semi-automatic pistol, bearing serial number L49873, and an Intratec, Model Tec-9, 9 mm., semi-automatic pistol (a semi-automatic assault weapon), bearing serial number D017120.

13. Defendant JOAO DIALLO SEBASTIAO drove defendant GERALD BELL to his residence.

14. Later that day, defendant ANTHONY WILLIAMS and/or defendant JOAO DIALLO SEBASTIAO provided defendant GERALD BELL with cocaine base (“crack”) as a payment to defendant GERALD BELL for straw purchasing firearms.

15. On or after November 14, 2002, after the Taurus, Model PT99, 9 mm., semi-automatic pistol, bearing serial number L49873, was recovered by the Philadelphia Police Department in a home that belonged to someone other than defendant ANTHONY WILLIAMS or JOAO DIALLO SEBASTIAO, defendants ANTHONY WILLIAMS and JOAO DIALLO SEBASTIAO directed defendant GERALD BELL to report the firearm stolen.

The November 13, 2002 Straw Purchases of Two Firearms

On or about November 12, 2002:

16. Defendant JOAO DIALLO SEBASTIAO drove defendant ANTHONY WILLIAMS and defendant GERALD BELL to Archery and Gun Outfitters.

17. Before defendant GERALD BELL entered Archery and Gun Outfitters, defendants ANTHONY WILLIAMS and JOAO DIALLO SEBASTIAO gave defendant GERALD BELL money to purchase two firearms.

18. Defendants GERALD BELL, ANTHONY WILLIAMS and JOAO DIALLO SEBASTIAO entered Archery and Gun Outfitters.

19. Defendant GERALD BELL, at the direction of defendants ANTHONY WILLIAMS and JOAO DIALLO SEBASTIAO, attempted to purchase an S.W.D., Model M-11, 9 mm., semi-automatic pistol (a semi-automatic assault weapon), bearing serial number 890007911, and a Kel-Tec, Model P-11, 9 mm., semi-automatic pistol, bearing serial number 125553, by falsely stating on the ATF 4473 form that he was the actual buyer of the firearms, but such purchases were not approved by Archery and Gun Outfitters at that time.

On or about November 13, 2002:

20. Defendant GERALD BELL was advised by Archery and Gun Outfitters that he was approved for the purchases of the firearms.

21. Defendant JOAO DIALLO SEBASTIAO drove defendants ANTHONY WILLIAMS and GERALD BELL to Archery and Gun Outfitters.

22. Defendant GERALD BELL, at the direction of defendants ANTHONY WILLIAMS and JOAO DIALLO SEBASTIAO, entered Archery and Gun Outfitters.

23. Defendant GERALD BELL, at the direction of defendants ANTHONY WILLIAMS and JOAO DIALLO SEBASTIAO, completed the transaction he had initiated the previous day, and purchased an S.W.D., Model M-11, 9 mm., semi-automatic pistol (a semi-automatic assault weapon), bearing serial number 890007911, and a Kel-Tec, Model P-11, 9 mm., semi-automatic pistol, bearing serial number 125553. Attached to the barrel of the S.W.D. M-11 was a 7 ½ inch long barrel extension. The S.W.D. M-11 firearm, a 7 ½ inch long barrel extension, a suppressor and two detachable magazine assemblies -- one loaded with 32 9 mm. cartridges -- were in a silver carrying case.

24. After leaving Archery and Gun Outfitters and at the direction of defendants ANTHONY WILLIAMS and JOAO DIALLO SEBASTIAO, defendant GERALD BELL transferred to defendants ANTHONY WILLIAMS and JOAO DIALLO SEBASTIAO the two firearms that he had just purchased, that is, an S.W.D., Model M-11, 9 mm., semi-automatic pistol (a semi-automatic assault weapon), bearing serial number 890007911, and a Kel-Tec, Model P-11, 9 mm., semi-automatic pistol, bearing serial number 125553. Defendant GERALD BELL also transferred ammunition that defendant GERALD BELL had just purchased to defendants ANTHONY WILLIAMS and JOAO DIALLO SEBASTIAO.

25. Shortly after leaving Archery and Gun Outfitters and at the direction of defendants ANTHONY WILLIAMS and JOAO DIALLO SEBASTIAO, defendant GERALD BELL returned to Archery and Gun Outfitters and exchanged the ammunition he had just purchased for the correct ammunition for the firearms.

26. Defendant JOAO DIALLO SEBASTIAO drove defendant GERALD BELL to his residence.

27. Later that day, defendant ANTHONY WILLIAMS and/or defendant JOAO DIALLO SEBASTIAO provided defendant GERALD BELL with cocaine base (“crack”) as a payment to defendant GERALD BELL for straw purchasing firearms.

The December 11, 2002 Attempted Straw Purchases of Firearms

On or about December 10, 2002:

28. Defendants ANTHONY WILLIAMS and JOAO DIALLO SEBASTIAO, driving in separate cars, arrived at defendant GERALD BELL’s residence at approximately the same time.

29. In the presence of defendant JOAO DIALLO SEBASTIAO and while in defendant GERALD BELL’s residence, defendant ANTHONY WILLIAMS stated that he wanted defendant GERALD BELL to straw purchase firearms.

30. In the presence of defendant ANTHONY WILLIAMS and while in defendant GERALD BELL’s residence, defendant JOAO DIALLO SEBASTIAO sold defendant GERALD BELL approximately 1.2 grams of cocaine base (“crack”) for \$120.

31. Defendants ANTHONY WILLIAMS and JOAO DIALLO SEBASTIAO then left defendant GERALD BELL’s residence, but returned soon thereafter.

32. Upon their return, defendants ANTHONY WILLIAMS and JOAO DIALLO SEBASTIAO entered defendant GERALD BELL’s residence together. Defendant JOAO DIALLO SEBASTIAO then sold defendant GERALD BELL additional cocaine base (“crack”), that is, 0.8 grams for approximately \$80.

33. While in the presence of defendant JOAO DIALLO SEBASTIAO and while in defendant GERALD BELL’s residence, defendant ANTHONY WILLIAMS told

defendant GERALD BELL that WILLIAMS wanted BELL to straw purchase firearms from Mike and Kate's Sport Shoppe.

On or about December 11, 2002:

34. Defendant ANTHONY WILLIAMS drove defendant GERALD BELL to Mike and Kate's Sport Shoppe.

35. During the drive to Mike and Kate's Sport Shoppe, defendant ANTHONY WILLIAMS stated that he had sold firearms that defendant GERALD BELL straw purchased. Defendant ANTHONY WILLIAMS stated that he had a potential buyer for the firearm he intended GERALD BELL to purchase on that night. Defendant ANTHONY WILLIAMS also stated that he and defendant JOAO DIALLO SEBASTIAO were partners and that defendant ANTHONY WILLIAMS had made defendant JOAO DIALLO SEBASTIAO approximately \$2,000 profit from the sale of firearms.

36. Before defendant GERALD BELL entered Mike and Kate's Sport Shoppe, defendant ANTHONY WILLIAMS gave defendant GERALD BELL money to purchase a firearm.

37. Defendants GERALD BELL and ANTHONY WILLIAMS entered Mike and Kate's Sport Shoppe.

38. At the direction of defendant ANTHONY WILLIAMS, defendant GERALD BELL asked for a specific firearm. Mike and Kate's Sport Shoppe, however, declined to allow defendant GERALD BELL to purchase the firearm.

39. Defendant ANTHONY WILLIAMS drove defendant GERALD BELL to his residence.

40. On the drive to defendant GERALD BELL's residence, defendant ANTHONY WILLIAMS stated that he wanted defendant GERALD BELL to straw purchase firearms at another time from Archery and Gun Outfitters.

41. Defendant ANTHONY WILLIAMS returned to defendant GERALD BELL's residence shortly after driving him home. There, defendant ANTHONY WILLIAMS sold a controlled substance to defendant GERALD BELL.

The Attempted Cover-Up

42. On or about December 20, 2002, two days after defendant ANTHONY WILLIAMS was arrested for possessing approximately 9.9 grams of cocaine base ("crack"), approximately 21 grams of cocaine, and the S.W.D., Model M-11, 9 mm., semi-automatic pistol (a semi-automatic assault weapon), bearing serial number 890007911, which had been straw purchased on or about November 12, 2002, by defendant GERALD BELL for defendants ANTHONY WILLIAMS and JOAO DIALLO SEBASTIAO, and the Smith and Wesson, Model SW380, .380 caliber semi-automatic pistol, bearing serial number RAJ2526, which had been straw purchased on or about October 30, 2002, by defendant GERALD BELL for defendants ANTHONY WILLIAMS and JOAO DIALLO SEBASTIAO, defendant JOAO DIALLO SEBASTIAO telephoned defendant GERALD BELL, told him the circumstances of defendant ANTHONY WILLIAMS' arrest, and directed him to testify as a witness for defendant ANTHONY WILLIAMS at his upcoming court hearing.

43. During the telephone conversation on or about December 20, 2002, defendant JOAO DIALLO SEBASTIAO directed defendant GERALD BELL to lie at defendant ANTHONY WILLIAMS' court hearing by saying that defendant GERALD BELL had accidentally

left the two firearms at defendant ANTHONY WILLIAMS' residence, when in fact defendants ANTHONY WILLIAMS and JOAO DIALLO SEBASTIAO knew that defendant GERALD BELL had straw purchased those firearms for defendants ANTHONY WILLIAMS and JOAO DIALLO SEBASTIAO and had transferred those firearms to defendants ANTHONY WILLIAMS and JOAO DIALLO SEBASTIAO.

The January 17, 2003 Attempted Straw Purchase of Two Firearms

44. On or about January 16, 2003, defendant JOAO DIALLO SEBASTIAO asked defendant GERALD BELL to straw purchase firearms.

On or about January 17, 2003:

45. Defendant JOAO DIALLO SEBASTIAO asked defendant GERALD BELL to straw purchase firearms so that defendant JOAO DIALLO SEBASTIAO could resell them.

46. Defendant JOAO DIALLO SEBASTIAO, carrying a loaded Beretta, Model 8045F, .45 caliber semi-automatic pistol, bearing serial number 066084MC, in his waistband and wearing a ballistic vest, drove defendant GERALD BELL to Archery and Gun Outfitters.

47. Before defendant GERALD BELL entered Archery and Gun Outfitters, defendant JOAO DIALLO SEBASTIAO gave defendant GERALD BELL money to purchase two firearms.

48. Defendants GERALD BELL and JOAO DIALLO SEBASTIAO entered Archery and Gun Outfitters.

49. Defendant GERALD BELL, at the direction of defendant JOAO DIALLO

SEBASTIAO, purchased an AMT, Model Hardball, .45 caliber, semi-automatic pistol, bearing serial number A31850, and a Springfield, Model XD, .357 caliber, semi-automatic pistol, bearing serial number US331240.

50. While in Archery and Gun Outfitters, defendant JOAO DIALLO SEBASTIAO took possession of the two firearms, that is, an AMT, Model Hardball, .45 caliber, semi-automatic pistol, bearing serial number A31850, and a Springfield, Model XD, .357 caliber, semi-automatic pistol, bearing serial number US331240.

All in violation of Title 18, United States Code, Section 371.

COUNTS TWO THROUGH EIGHT

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 through 5 of Count One are incorporated here.
2. On or about the dates listed below, in the Eastern District of Pennsylvania, defendants

**ANTHONY WILLIAMS,
a/k/a “Robert Williams,”
JOAO DIALLO SEBASTIAO,
a/k/a “Dee,” and
GERALD BELL**

in connection with the acquisition of the firearms listed below from Archery and Gun Outfitters, an FFL, knowingly made and aided and abetted the making of a false and fictitious statement with respect to information required by the provisions of Chapter 44 to be kept in the records of an FFL dealer, in that defendant GERALD BELL, at the direction of defendants ANTHONY WILLIAMS and JOAO DIALLO SEBASTIAO, certified on Department of Treasury Form 4473, Firearms Transaction Record, that he was the actual buyer of the firearms listed below, when as defendants ANTHONY WILLIAMS, JOAO DIALLO SEBASTIAO and GERALD BELL well knew, these statements were false and fictitious.

Count	Date	FIREARMS	
		Make / Model / caliber / type Number	Serial
2	10/30/02	Springfield, Model XD, .40 caliber semi-automatic pistol	US442096
3	10/30/02	Smith and Wesson, Model SW30, .380 caliber, semi-automatic pistol	RAJ2526
4	10/31/02	Ruger, Model P95DC, 9 mm., semi-automatic pistol	31463789

5	10/31/02	Taurus, Model PT99, 9 mm., semi-automatic pistol	L49873
6	10/31/02	Intratec, Model Tec-9, 9 mm., semi-automatic pistol (a semi-automatic assault weapon)	D017120
7	11/12/02	S.W.D., Model M-11, 9 mm., semi-automatic pistol (a semi-automatic assault weapon)	890007911
8	11/12/02	Kel-Tec, Model P-11, 9 mm., semi-automatic pistol	125553

All in violation of Title 18, United States Code, Sections 924(a)(1)(A) and 2.

COUNTS NINE THROUGH ELEVEN

THE GRAND JURY FURTHER CHARGES THAT:

1. On or about the dates listed below, in the Eastern District of Pennsylvania,
defendant

ANTHONY WILLIAMS,

having previously been convicted in a court of the Commonwealth of Pennsylvania of a crime
punishable by imprisonment for a term exceeding one year, knowingly possessed in and affecting
interstate and foreign commerce the firearms listed below:

Count	Date	FIREARMS	
		Make / Model / caliber / type Number	Serial
9	10/30/02	Springfield, Model XD, .40 caliber semi-automatic pistol	US442096
		Smith and Wesson, Model SW30, .380 caliber, semi-automatic pistol	RAJ2526
10	10/31/02	Ruger, Model P95DC, 9 mm., semi-automatic pistol	31463789
		Taurus, Model PT99, 9 mm., semi-automatic pistol	L49873
		Intratec, Model Tec-9, 9 mm., semi-automatic pistol (a semi-automatic assault weapon)	D017120
11	11/13/02	S.W.D., Model M-11, 9 mm., semi-automatic pistol (a semi-automatic assault weapon)	890007911
		Kel-Tec, Model P-11, 9 mm., semi-automatic pistol	125553

All in violation of Title 18, United States Code, Section 922(g)(1).

COUNT TWELVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 18, 2002, at Philadelphia, Pennsylvania, in the Eastern District of Pennsylvania, defendant

ANTHONY WILLIAMS,

knowingly and intentionally possessed with intent to distribute in excess of 5 grams, that is, approximately 9.9 grams, of a mixture or substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B).

COUNT THIRTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 18, 2002, at Philadelphia, Pennsylvania, in the Eastern District of Pennsylvania, defendant

ANTHONY WILLIAMS,

knowingly and intentionally possessed with intent to distribute approximately 21.3 grams of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT FOURTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 18, 2002, at Philadelphia, Pennsylvania, in the Eastern District of Pennsylvania, defendant

ANTHONY WILLIAMS,

knowingly possessed a firearm, that is, a S.W.D., Model M-11, 9 mm., semi-automatic pistol (a semi-automatic assault weapon), bearing serial number 890007911, in furtherance of a drug trafficking crime for which he may be prosecuted in a Court of the United States, that is, possession with intent to distribute more than 5 grams of cocaine base ("crack"), in violation of Title 21, United States Code, Section 841(a)(1), as charged in Count 12 of this Indictment and possession with intent to distribute cocaine, in violation of Title 21, United States Code, Section 841(a)(1), as charged in Count 13 of this Indictment.

In violation of Title 18, United States Code, Section 924(c)(1).

COUNT FIFTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 11, 2002, at Philadelphia, Pennsylvania, in the Eastern District of Pennsylvania, defendant

ANTHONY WILLIAMS,

knowingly and intentionally distributed approximately 2.9 grams of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT SIXTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 10, 2002, at Philadelphia, Pennsylvania, in the Eastern District of Pennsylvania, defendant

**JOAO DIALLO SEBASTIAO,
a/k/a “Dee,”**

knowingly and intentionally distributed approximately 1.2 grams of a mixture or substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT SEVENTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 10, 2002, at Philadelphia, Pennsylvania, in the Eastern District of Pennsylvania, defendant

**JOAO DIALLO SEBASTIAO,
a/k/a “Dee,”**

knowingly and intentionally distributed approximately 0.8 grams of a mixture or substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT EIGHTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 10, 2002, at Philadelphia, Pennsylvania, in the Eastern District of Pennsylvania, defendant

**JOAO DIALLO SEBASTIAO,
a/k/a “Dee,”**

knowingly possessed a firearm in furtherance of a drug trafficking crime for which he may be prosecuted in a Court of the United States, that is, distribution of cocaine base (“crack”), in violation of Title 21, United States Code, Section 841(a)(1), as charged in Count 17 of this Indictment.

In violation of Title 18, United States Code, Section 924(c)(1).

NOTICE OF FORFEITURE

As a result of the violations of Title 18, United States Code, Sections 924(a)(1)(A) and 922(g)(1) set forth in Counts Two through Eleven of this Indictment, the defendants,

**ANTHONY WILLIAMS,
a/k/a “Robert Williams,” and
JOAO DIALLO SEBASTIAO,
a/k/a “Dee,”**

shall forfeit to the United States of America, pursuant to 18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c), the firearms and ammunition involved in the commission of these offenses, including, but not limited to:

(1) a Springfield, Model XD, .40 caliber semi-automatic pistol, bearing serial number US442096;

(2) a Smith and Wesson, Model SW30, .380 caliber, semi-automatic pistol, bearing serial number RAJ2526;

(3) a Ruger, Model P95DC, 9 mm., semi-automatic pistol, bearing serial number 31463789;

(4) a Taurus, Model PT99, 9 mm., semi-automatic pistol, bearing serial number L49873;

(5) an Intratec, Model Tec-9, 9 mm., semi-automatic pistol (a semi-automatic assault weapon), bearing serial number D017120;

(6) a S.W.D., Model M-11, 9 mm., semi-automatic pistol (a semi-automatic assault weapon), bearing serial number 890007911; and,

(7) a Kel-Tec, Model P-11, 9 mm., semi-automatic pistol, bearing serial number 125553.

All pursuant to Title 28, United States Code, Section 2461(c) and Title 18, United States Code, Section 924(d).

A TRUE BILL:

FOREPERSON

PATRICK L. MEEHAN
United States Attorney